

Message

From: Carson, David A (ENRD) [David.A.Carson@usdoj.gov]
Sent: 8/10/2017 5:16:29 PM
To: Neugeboren, Steven [Neugeboren.Steven@epa.gov]; Schroer, Lee [schroer.lee@epa.gov]; Prabhu, Aditi [Prabhu.Aditi@epa.gov]
CC: Ford, Peter [Ford.Peter@epa.gov]
Subject: FW: Slightly revised motion
Attachments: DENVER-#583978-v2-Maine_Draft_Status_Report_and_Motion_for_Additional_Stay (HBMI-PN edits).DOC

Atty-Client / Atty WP / Deliberative / Ex.5

From: Carson, David A (ENRD)
Sent: Thursday, August 10, 2017 11:13 AM
To: 'Williamson, Timothy' <Williamson.Tim@epa.gov>; Williams, Ann <Williams.Ann@epa.gov>; Knapp, Michael <Knapp.Michael@epa.gov>; Siegal, Tod <Siegal.Tod@epa.gov>; Ford, Peter <Ford.Peter@epa.gov>
Subject: FW: Slightly revised motion

Atty-Client / Atty WP / Deliberative / Ex.5

From: Jane Steadman [mailto:jsteadman@kanjikatzen.com]
Sent: Thursday, August 10, 2017 11:04 AM
To: Carson, David A (ENRD) <DCarson@ENRD.USDOJ.GOV>
Cc: David M. Kallin (DKallin@dwmlaw.com) <DKallin@dwmlaw.com>; Kaighn Smith, Jr. (KSmith@dwmlaw.com) <KSmith@dwmlaw.com>
Subject: RE: Slightly revised motion

Dave,

Attached are HBMI's and Penobscot's proposed edits. The additional language reflects that the Tribes previously opposed EPA's motion for the 90-day stay of proceedings, as well as the possibility that the Tribes will oppose EPA's current motion for a 120-day stay within the timeframe provided by the local rules.

Would any of you like me to set up a conference line for a call about this?

Best,
Jane

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Jane Steadman  
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**From:** Jane Steadman

**Sent:** Thursday, August 10, 2017 8:50 AM

**To:** Carson, David A (ENRD) <[David.A.Carson@usdoj.gov](mailto:David.A.Carson@usdoj.gov)>

**Subject:** Re: Slightly revised motion

Hi Dave,

I just saw that you called. I'm on a crowded bus, so will call when I get into the office. We will have some edits to offer this morning, which I believe are in line with what Penobscot also has in mind. I will send a track changes draft before calling.

Jane

Sent from my iPhone

On Aug 9, 2017, at 11:12 AM, Carson, David A (ENRD) <[David.A.Carson@usdoj.gov](mailto:David.A.Carson@usdoj.gov)> wrote:

All: Scott asked me to include a sentence to the effect that briefing remains in abeyance. I have added a couple of sentences to the effect that this is the parties' understanding and that the parties would want to propose a schedule before anyone's brief is due. You are all seeing it for the first time, so please let me know if anyone wants changes to the new sentences.

The draft is otherwise unchanged, though I did change a typographically incorrect date in the first paragraph (from 2018 to 2017).

Thanks,

Dave

<DENVER-#583978-v2-Maine\_Draft\_Status\_Report\_and\_Motion\_for\_Additional\_Stay.DOC>